

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

vs.

COLLINS MURPHY et. al.,

Defendants.

Case No.: 7:20-cv-00947-DCC

**HAMMY MEDIA, LTD.; WISEBITS IP,
LTD.; AND TRAFFICSTARS, LTD'S
MOTION FOR LEAVE TO FILE
CONSOLIDATED REPLY BRIEF AND
TO EXCEED PAGE LIMITATION**

JANE DOE,

Plaintiff,

vs.

LIMESTONE UNIVERSITY et. al.,

Defendants.

Case No.: 7:21-cv-03193- DCC

**HAMMY MEDIA, LTD.; WISEBITS IP,
LTD.; AND TRAFFICSTARS, LTD'S
MOTION FOR LEAVE TO FILE
CONSOLIDATED REPLY BRIEF AND
TO EXCEED PAGE LIMITATION**

Defendants Hammy Media, Ltd., Wisebits IP, Ltd. and Trafficstars, Ltd. (“Defendants”) by and through their undersigned counsel file this Motion for Leave to File a Consolidated Reply Brief in Response to Plaintiffs’ Response to their Motions for Summary Judgment (Dkt. Nos. 489, 492, 493 of case 00947) and (Dkt. Nos. 301, 304, 305 of case 03193) and to Exceed Page Limitation with respect to their reply.

Local Rule 7.05(B)(2) of the District Court for the District of South Carolina states that reply briefs are limited to fifteen pages. Per this Court’s prior ruling, the maximum length of each Defendant’s individual reply was expanded to twenty-five pages. This would result in a combined total of seventy-five pages between the three Defendants. While Defendants certainly do not

anticipate filing a reply that is seventy-five pages in length, Defendants respectfully request leave of the Court to exceed the twenty-five-page limitation for their consolidated reply.

Good cause exists for extending the page limitation. Defendants seek to file a consolidated brief to avoid redundancy of briefing the same issues for each respective Defendant. A consolidated brief is the most succinct and efficient manner for Defendants to present their replies to this Court. Nonetheless, if this Court grants Defendants' motion to file a single consolidated reply brief on behalf of the Hammy Defendants, such a reply brief must be longer than twenty-five pages in order to address all the issues before the Court for each Defendant. This is a consolidated case involving multiple parties alleging complicated facts and issues of law and the record is voluminous. In addition, Plaintiffs' responses to Defendants' motions for summary judgment are replete with misinformation resulting in a significant number of issues to which Defendants must reply. The voluminous record, the multiple parties, and the multitude of issues raised by Plaintiffs in response to Defendants' motion renders it impossible for Defendants to avoid exceeding the twenty-five-page limitation.

For the foregoing reasons, Defendants respectfully request the Court grant them leave to file a consolidated reply brief and to exceed the page limitation for their consolidated reply brief.

Counsel for Defendants has attempted to confer with Plaintiffs' counsel regarding the substance of this Motion. At the time of filing this Motion, counsel for Defendants have received no response to this request.

Respectfully submitted,

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